## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES EX REL PLUNKERT,	)
Plaintiff,	)
v.	Civil Action No. 1:19-cv-03375-SAG
MARYLAND BROADBAND	)
COOPERATIVE, et al.,	)
	)
Defendants.	)
	)

## CONSENT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Pursuant to Local Rule 105(9), Defendant Maryland Broadband Cooperative respectfully requests an enlargement of time of 15 days to respond to the Complaint filed by Plaintiff-Relator Krah Plunkert. Plaintiff-Relator consents to this motion.

Good cause exists for this extension for the following reasons:

- 1. This is a False Claims Act case. The six-count complaint was initially filed under seal in November 2019. Dkt. 1.
- 2. Following the declination of the United States to intervene in this matter (Dkt. 25), the Court unsealed the complaint on March 29, 2023 (Dkt. 26). The State of Maryland also declined to intervene, and the Court dismissed the two Maryland law counts. Dkt. 27
- 3. Plaintiff-Relator served Maryland Broadband with the complaint on June 2, 2023. On June 21, 2023, the Court granted Maryland Broadband's consent motion for a 30-day extension of time to respond to the complaint. Dkt. 44. The response to the complaint is currently due on July 24, 2023.

- 4. The complaint has four remaining counts against Maryland Broadband. It is lengthy: 68 pages and 263 paragraphs.
- 5. Maryland Broadband retained undersigned counsel for this matter and has spent considerable time on its response but requests additional time due to the complexity of the allegations.

A proposed order is attached.

July 14, 2023

Respectfully submitted

/s/ Sara E. Kropf
Sara E. Kropf (Bar No. 26818)
KROPF MOSELEY PLLC
1100 H Street NW
Suite 1220
Washington, DC 20005
(202) 627-6900
sara@kmlawfirm.com

Attorney for Defendant Maryland Broadband Cooperative

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of July 2023, the foregoing motion was served by electronic filing on all counsel of record through the Court's electronic filing system.

/s/ Sara E. Kropf Sara E. Kropf